



Approving University Official(s): Vice President and Chief Financial Officer; Vice President for Operations and Chief Operating Officer, Provost
Responsible Office: Provost; Human Resources; Student Affairs; Office of Civil Rights and Title IX Compliance
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REASONABLE ACCOMMODATION POLICY

Policy Statement

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act (ADA), the Pregnant Workers' Fairness Act (PWFA), Title IX of the Education Amendments of 1972 (Title IX), Title VII of the Civil Rights Act of 1964 (Title VII), and applicable state laws, Northwestern University will reasonably accommodate students, employees and job applicants, and third parties who require accommodations on the bases of disability, pregnancy and lactation, and religion, unless a fundamental alteration or undue hardship applies.

Purpose

This Policy: (1) names responsible offices overseeing accommodation requests for specific subsections of the University community, and clarifies the responsibilities of each office regarding confidentiality and reporting; and (2) provides instructions for requesting each type of accommodation and outlines the expected process.

Audience

This policy applies to all University community members, as well as third parties who request accommodations under this Policy.

Definitions

AccessibleNU ("ANU"): An office within the Division of Student Affairs that provides accommodations to students with disabilities.

Accommodation: A modification or adjustment to a program, service, job, or application process that makes it possible for the following to enjoy equal opportunities: (1) individuals with disabilities; (2) individuals with pregnancy or related conditions; and (3) individuals observing sincerely held religious beliefs.

Disability: A physical or mental impairment which substantially limits one or more major life activities such as walking, seeing, hearing, breathing, bending, lifting, or sitting.

Employee: For purposes of this Policy, “employee” means all full-time and part-time faculty, University staff, student employees, wage employees (including temporary employees), professional research staff, and post-doctoral fellows.

Fundamental alteration: A change to an academic program, service, or activity that significantly changes the essential nature of the program, service, or activity.

Human Resources (“HR”): An office at the University that oversees employee performance, resources, benefits and related policies.

Individual with a Disability: An individual who has: (1) a physical or mental impairment which substantially limits one or more major life activities such as walking, seeing, hearing, breathing, bending, lifting, or sitting; (2) a record of such an impairment; and/or (3) is regarded as having such an impairment.

Job Applicant: An individual who submits an application for a vacant position at the University.

Office of Civil Rights and Title IX Compliance (“OCR”): An office within the Office of the President that serves as a University-wide resource on disability- and accessibility-related information, procedures and services for the University community. This office oversees disability accommodations for employees, student employees, and third parties; pregnancy accommodations for employees, student employees and students; and religion accommodations for employees.

Pregnancy: Pregnancy means (1) pregnancy, childbirth, termination of pregnancy, or lactation; (2) medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; (3) recovery from pregnancy, lactation, or related medical conditions.

Student: An individual who has gained admission to the University, or has attended or is attending Northwestern University; and whose records are in the files of the University. Attendance is defined as the date of the first enrollment at the University or participation in a University sponsored program or activity, whichever occurs earlier.

Student Employee: This term includes the following:

- (1) Undergraduate students¹ employed in student-worker positions; and
- (2) Graduate students and Ph.D candidates who are employed as Teaching Assistants or Research Assistants.

Third Party: An individual who is neither a student nor an employee as defined under this Policy, and who utilizes University services and/or attends a University program or event. This includes visitors to campus; contractors; and individuals participating in University investigatory and misconduct processes.

Undue hardship: A change to the work environment that would impose significant operational difficulties and/or financial strain.

Policy Implementation

I. Disability Accommodations

¹ Accommodation requests related to undergraduate students who serve as Resident Assistants, while not employees of the University, should follow the guidance for Employees, Student Employees and Job Applicants as outlined in this policy.

A. Students

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the student has provided written permission for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies.

b. Responsibilities

- i. **Students:** Students who wish to request a disability accommodation are responsible for: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and for promptly communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
- iii. **Individuals receiving disclosure of possible accommodation need:** Students may disclose possible accommodation needs to employees. In such cases, employees should refer students to the appropriate accommodation office for further assistance. Employees who receive disclosures are not required to report such potential needs directly to the respective accommodation office. Employees should keep such disclosures confidential.

c. Academic Accommodations

- i. **How to request academic accommodations:** Students who wish to request disability accommodations for academic programs and services should contact ANU at:

- **Evanston Office**
2122 Sheridan Road, Suite 130
Evanston, IL 60208
Email: accessiblenu@northwestern.edu
Phone: (847) 467-5530
- **Chicago Office:**
710 N. Lakeshore Drive
Suite 727
Chicago, IL 60611
Email: accessiblenu@northwestern.edu
Phone: (847) 467-5530
- **Qatar Office:**
accessible@qatar.northwestern.edu

- ii. **Basic overview of accommodation process:** ANU will conduct an interactive process as needed with the student, their healthcare provider(s), and departments. ANU reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in a fundamental alteration. ANU is the final determinator for

academic accommodation requests. Additional information about their procedures is available at: <https://www.northwestern.edu/accessiblenu/students/>

d. **Housing and Dining Accommodations**

- i. **How to request a housing and/or dining accommodation:** Students who wish to request disability accommodations for University housing and meal plans should submit requests through the Residential Services portal at: <https://www.northwestern.edu/living/current/housing-dining-accommodation-requests.html>
- ii. **Basic overview of accommodation process:** Residential Services, in consultation with ANU and the dining services contact as needed, will engage in an interactive process with the student, and if necessary, their healthcare provider(s). Residential Services and/or ANU reserve the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in a fundamental alteration. Residential Services and ANU are the final determinators for housing and dining accommodation requests. Additional information about their procedures is available at: <https://www.northwestern.edu/living/current/housing-dining-accommodation-requests.html>

e. **Filing a Disability Grievance**

Students who experience the following may file a disability grievance with OCR:

1. Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
2. Disagreement with a determination made by ANU or Residential Services; and/or
3. Concerns about discriminatory treatment during the interactive accommodation process.

Disability grievances should be filed as soon as possible after the student becomes aware of the alleged violation.

In the case of a grievance involving academic accommodations, students are encouraged to first follow ANU's informal appeal process before filing a grievance with OCR. However, students may opt to go straight to OCR. ANU's informal appeal process is available at <https://www.northwestern.edu/accessiblenu/about-us/appeal-process.html>

To file a disability grievance with OCR: Students can file a grievance by contacting:

ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

Students can also submit a grievance through the Online Reporting Form at www.northwestern.edu/NUReportDiscrimination

After a disability grievance is received: The ADA Coordinator or their designee will acknowledge receipt of grievances in a timely fashion, and evaluate each grievance according to the procedures laid out in the Policy on Discrimination and Harassment.

B. Employees, Student Employees and Job Applicants

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the employee or job applicant has provided written permission for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies.

b. Responsibilities

- i. **Employees, Student Employees and Job Applicants:** Employees, student employees and job applicants who wish to request a disability accommodation are responsible for: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and for promptly communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.
 - **For offices overseeing hiring processes:** Such offices are responsible for developing internal procedures to respond to accommodation requests from job applicants in a timely manner.
- iii. **Individuals receiving disclosure of possible accommodation need:** Employees and job applicants may disclose possible accommodation needs to their colleagues, supervisors, and/or persons overseeing the job application process. In such cases, the employee or job applicant should be referred to the appropriate internal contact overseeing the hiring process and/or accommodation office for further assistance. Persons to whom the potential need is disclosed should keep the disclosure confidential. Persons receiving the disclosure do not need to report it to OCR, unless further assistance from OCR is necessary to facilitate the accommodation process.

c. Employee Accommodations

- i. **How to request employment accommodations:** Faculty and staff who wish to request disability accommodations should contact OCR at accommodations@northwestern.edu or 847-467-6165. Faculty and staff can also fill out the accommodation request form at: https://cm.maxient.com/reportingform.php?NorthwesternUniv&layout_id=33
- ii. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the faculty or staff member, their healthcare provider(s), and relevant departments (including HR). OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship. OCR is the final determinator for faculty and staff employment accommodation requests. Additional information about their procedures is available at:

<https://www.northwestern.edu/civil-rights-office/policies-procedures/accommodation/>

d. Student Employee Accommodations

- i. **How to request employment accommodations:** Student employees who wish to request disability accommodations should contact OCR at accommodations@northwestern.edu or 847-467-6165. Student employees can also fill out the accommodation request form at: https://cm.maxient.com/reportingform.php?NorthwesternUniv&layout_id=33
- ii. **Coordination with ANU:** If a student is already registered with ANU, the student can sign an authorization to share ANU's information with OCR, for greater ease of documentation in the employee accommodation process. OCR and ANU will also coordinate as necessary if the student employee's accommodation request involves housing and dining as it relates to the student's employment duties.
- iii. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the student employee, their healthcare provider(s), and relevant departments (including HR). OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in an undue hardship. OCR is the final determinator for student employee accommodation requests. Additional information about their procedures is available at: <https://www.northwestern.edu/civil-rights-office/policies-procedures/accommodation/>

e. Job Applicant Accommodations

- i. **How to request accommodations:** Job applicants who wish to request disability accommodations should contact the Human Resources contact listed in the application form, or OCR at accommodations@northwestern.edu or 847-467-6165.
- ii. **Basic overview of accommodation process:** The HR representative overseeing the application process, in consultation with OCR, will conduct an interactive process as needed with the job applicant. While most accommodation requests related to a job application process are expected to be reasonable on their face, HR and/or OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in an undue hardship.

f. Filing a Disability Grievance

Employees, student employees and job applicants who experience the following may file a disability grievance with OCR:

- 1) Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
- 2) Disagreement with a determination made by an office handling the accommodation process; and/or
- 3) Concerns about discriminatory treatment during the interactive accommodation process.

Disability grievances should be filed as soon as possible after the employee, student employee or job applicant becomes aware of the alleged violation.

To file a disability grievance with OCR: Employees and job applicants can file a grievance by contacting:

ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

If the grievance concerns a determination made by the ADA Coordinator's office on an accommodation process, the employee or job applicant may instead contact:

Vice President for Human Resources
1800 Sherman Ave., Suite 4100
Evanston, IL 60201
Phone: (847) 467-1466
Officeofhumanresources@northwestern.edu

Employees and job applicants can also submit a grievance through the Online Reporting Form at www.northwestern.edu/NUReportDiscrimination

After a disability grievance is received: The ADA Coordinator or Vice President for HR, or their designee, will acknowledge receipt of grievances in a timely fashion. Grievances overseen by the ADA Coordinator will be handled according to the procedures laid out in the Policy on Discrimination and Harassment. Grievances overseen by the Vice President for HR's office will be handled according to HR investigative procedures.

C. Third Party Accommodations

a. Confidentiality

Offices handling medical information received in the course of a disability accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the third party has provided written permission for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies.

b. Responsibilities

- i. **Third Party:** Third parties who wish to request a disability accommodation are responsible for: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and for promptly communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
- ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.

- **Units and departments that host events:** Such units and departments are responsible for developing internal procedures to respond to accommodation requests in a timely fashion.
 - iii. **Individuals receiving disclosure of possible accommodation need:** Third parties disclosing a potential accommodation need should be referred to the appropriate accommodation office for further assistance. Persons to whom the potential need is disclosed should keep the disclosure confidential. Reporting the individual's potential accommodation need to the accommodation office is not required for disability accommodation requests, unless that office's assistance is necessary to facilitate the accommodation process.
- c. **Third Party Accommodations**
 - i. **How to request accommodations:** Third parties who wish to request disability accommodations for an event should contact the event coordinator. Event attendees may also contact OCR at accommodations@northwestern.edu or 847-467-6165. OCR may then coordinate with the event coordinator and/or other entities as needed. All other third parties can contact OCR to request accommodations.
 - ii. **Basic overview of accommodation process:** The event coordinator and/or OCR will conduct an interactive process as needed with the third party, their healthcare provider(s), and relevant departments. While most accommodation requests related to an event are expected to be reasonable on their face, the event coordinator and/or OCR reserve the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and/or to determine whether a requested accommodation would result in an undue hardship.
- d. **Filing a Disability Grievance**

Third parties who experience the following may file a disability grievance with OCR:

 - 1) Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
 - 2) Disagreement with a determination made on an accommodation request, and/or
 - 3) Concerns about discriminatory treatment during the interactive accommodation process.

Disability grievances should be filed as soon as possible after the third party becomes aware of the alleged violation.

To file a disability grievance with OCR: Third parties can file a grievance by contacting:

ADA Coordinator
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

Third parties can also submit a grievance through the Online Reporting Form at www.northwestern.edu/NUReportDiscrimination

After a disability grievance is received: The ADA Coordinator or their designee will acknowledge receipt of grievances in a timely fashion. Grievances overseen by the ADA Coordinator will be handled according to the procedures laid out in the Policy on Discrimination and Harassment.

II. Pregnancy and Lactation Accommodations

- a. **Confidentiality:** Offices handling information received in the course of a pregnancy and related conditions, including lactation, accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the requestor has provided written permission for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies.
- b. **Reporting obligations:**
 - i. If an **employee** indicates that they may need an accommodation related to pregnancy or related conditions, they can be provided OCR's contact information to request accommodations.
 - ii. If a **student** discloses their pregnancy or related conditions to a University employee, that employee **must** inform the student (1) of the name and contact information of the Title IX Coordinator and (2) that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to the recipient's education program or activity. The Title IX Coordinator's contact information is as follows:

Emily Babb
Associate Vice President for Civil Rights and Title IX Compliance
Title IX Coordinator
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
titleixcoordinator@northwestern.edu
- c. **How to request pregnancy and related conditions (including lactation) accommodations:** The Title IX Coordinator or their designee is responsible for all pregnancy- and related conditions accommodation requests. To request an accommodation, individuals can contact OCR at accommodations@northwestern.edu, 847-467-6165. Individuals can also complete the accommodation request form at https://cm.maxient.com/reportingform.php?NorthwesternUniv&layout_id=33
- d. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the individual, their healthcare provider(s), and relevant departments. Though documentation will generally not be required for common impacts of pregnancy and lactation, as most pregnancy- and lactation-related accommodation requests will be presumed reasonable, OCR reserves the right to request additional clarifications if it is necessary to assess reasonable accommodations for a given individual. OCR will be the final determinator on pregnancy accommodation requests.
- e. **Lactation resources:** The University will provide clean, private lactation spaces to students and employees. Students and employees who need to request access to the lactation spaces and related resources should contact the Well-being Office at lactation@northwestern.edu. OCR will refer requests for lactation space usage and related resources to Well-being and will coordinate with them as needed on lactation accommodation requests. OCR will be the final determinator on lactation accommodation

resources that go beyond the simple provision of resources readily available through Well-being.

f. Filing a Grievance:

Individuals who request a pregnancy and/or related conditions accommodation request who experience the following may file a grievance with OCR:

- 1) Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
- 2) Disagreement with a determination made on an accommodation request, and/or
- 3) Concerns about discriminatory treatment during the interactive accommodation process.

Grievances should be filed as soon as possible after the third party becomes aware of the alleged violation.

To file a grievance with OCR: Individuals can file a grievance by contacting:

Emily Babb
Associate Vice President for Civil Rights and Title IX Compliance
Title IX Coordinator
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
titleixcoordinator@northwestern.edu

Individuals can also submit a grievance through the Online Reporting Form at www.northwestern.edu/NUReportDiscrimination

After a grievance is received: The Title IX Coordinator or their designee will acknowledge receipt of grievances in a timely fashion. Grievances overseen by the Title IX Coordinator will be handled according to the procedures laid out in the Policy on Discrimination and Harassment.

III. Religion Accommodations

- a. **Confidentiality:** Offices handling information received in the course of a religion accommodation process will not share it with others outside of the office conducting said process, unless a need-to-know exception applies and/or the requestor has provided written permission for the office to do so. Offices conducting accommodation processes will not share information about a pending process or approved accommodations with others unless a need-to-know exception applies.
- b. **Responsibilities**
 - i. **Employees and students:** Employees and students who wish to request a religion accommodation are responsible for: initiating an accommodation request; engaging in the interactive process and following the office's procedures; and for promptly communicating with the office if a new/changed accommodation is needed or there is a concern about an accommodation's implementation.
 - ii. **Offices processing accommodation requests:** Such offices will acknowledge receipt of requests, engage in the interactive process, and make final determinations in a timely manner. Offices will maintain confidentiality as required under the relevant laws and University policies, including this policy.

- iii. **Individuals receiving disclosure of possible accommodation need:** Employees who receive a potential accommodation need from students, other employees under their supervision, and/or third parties should refer individual to the appropriate accommodation office for further assistance. Employees who receive disclosures are not required to report such potential needs directly to the respective accommodation office. Employees should keep such disclosures confidential.

c. Student Religion Accommodations

- i. **How to request accommodations:** Students who wish to request religion accommodations that impact their academic programs (i.e. classes or exams) should submit their request in writing to the faculty member.
- ii. **Basic overview of accommodation process:** The faculty member, in consultation with the Office of the Provost as needed, will decide whether to grant the accommodation. If there is any uncertainty about the reasonableness of a religion accommodation, the faculty member should contact the Office of the Provost for assistance. The Office of the Provost will then conduct an interactive process as needed with the student, the faculty member, and/or relevant departments. The Office of the Provost reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship. Additional information about their procedures is available at:
<https://www.northwestern.edu/provost/policies-procedures/classwork-curricular-policies/accommodations-for-religious-holidays.html>

d. Employee, Student Employee and Job Applicant Religion Accommodations

- i. **How to request accommodations:** Employees, student employees and job applicants who wish to request religion accommodations should contact OCR at accommodations@northwestern.edu or 847-467-6165.
- ii. **Basic overview of accommodation process:** OCR will conduct an interactive process as needed with the student and relevant departments. OCR reserves the right to request additional clarifications from participants in the interactive process to fully understand the rationale for a specific accommodation request; to explore what effective alternative accommodations may be available; and to determine whether a requested accommodation would result in an undue hardship. OCR is the final determinator for employee, student employee and job applicant religion accommodation requests. Additional information about their procedures is available at: <https://www.northwestern.edu/civil-rights-office/policies-procedures/accommodation/religion.html>

e. Filing a Grievance

Individuals who request a religion accommodation request who experience the following may file a grievance with OCR:

- 1) Failure to accommodate – namely, an approved accommodation is not properly implemented or implemented at all;
- 2) Disagreement with a determination made on an accommodation request, and/or
- 3) Concerns about discriminatory treatment during the interactive accommodation process.

Grievances should be filed as soon as possible after the individual becomes aware of the alleged violation.

To file a grievance: Students can file a grievance by contacting:
Office for Civil Rights and Title IX Compliance
Northwestern University
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu

If the grievance concerns a determination made by OCR on an accommodation process, the employee or job applicant may instead contact:

Vice President for Human Resources
1800 Sherman Ave., Suite 4100
Evanston, IL 60201
Phone: (847) 467-1466
Officeofhumanresources@northwestern.edu

Individuals can also submit a grievance through the Online Reporting Form at www.northwestern.edu/NUReportDiscrimination

After a grievance is received: The OCR or Vice President for HR, or their designee, will acknowledge receipt of grievances in a timely fashion. Grievances overseen by the OCR will be handled according to the procedures laid out in the Policy on Discrimination and Harassment. Grievances overseen by the Vice President for HR's office will be handled according to HR investigative procedures.

Consequences of Violating this Policy

Failures to fulfill the reporting obligations set forth in this policy will be referred to the appropriate office for corrective action.

Related Information

[Policy on Discrimination and Harassment](#)
[Policy on Sex-Based Discrimination and Sex-Based Harassment](#)

Contacts

The following office can address questions regarding this Policy:

Office of Civil Rights and Title IX Compliance
1800 Sherman Ave., Suite 4500
Evanston, IL 60201
(847) 467-6165
OCR@northwestern.edu
titleixcoordinator@northwestern.edu

History

This policy is updated.

Policy URL:

<https://www.northwestern.edu/civil-rights-office/policies-procedures/reasonable-accommodation-policy.pdf>